

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DUSTIN BOONE,
CHRISTOPHER MYERS,
RANDY HAYES, and
BAILEY COLLETTA,

Defendants.

Case No.: 4:18CR00975 CDP/JMB

DEFENDANT BAILEY COLLETTA'S
MOTION TO CONTINUE SENTENCING DATE

COMES NOW Defendant, Bailey Colletta, by and through her attorneys of record, and for her Motion to Continue her Sentencing Date, states the following:

1. On September 6, 2019, Defendant entered a plea of guilty to a Superseding Information.
2. Sentencing in this matter was set by the Court for December 13, 2019, at 2:30 p.m.
3. Defendant requests that her sentencing be continued, to be reset on a date subsequent to the sentencing of Co-defendant Randy Hayes and subsequent to the trial or other disposition of the charges pending against Co-defendants Dustin Boone and Christopher Meyers.
4. Defendant Colletta represents to the Court that this request is made with the consent of the Government.

5. Defendant Colletta further requests that the Court schedule new dates for the parties to file any sentencing memoranda and any responses thereto, consistent with the foregoing request.

Respectfully submitted,

KILO, FLYNN, BILLINGSLEY,
TRAME & BROWN, P.C.

By: /s/ JOHN A. KILO
JOHN A. KILO, #21674MO

By: /s/ MICHAEL W. FLYNN
MICHAEL W. FLYNN, #23342MO
Attorneys for
Defendant Bailey Colletta
5840 Oakland Avenue
St. Louis, Missouri 63110
TELE: 314/647-8910
FAX: 314/647-3134
E-MAIL: jkilo@kiloflynn.com
mflynn@kiloflynn.com

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2019, a copy of the foregoing Motion of Defendant Bailey Colletta to Continue Sentencing Date was filed electronically with the Clerk of the Court in the United States District Court, Eastern District of Missouri, Eastern Division and to be served by the operation of the Court's electronic filing system upon all attorneys of record.

/s/JOHN A. KILO / MICHAEL W. FLYNN